

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**NASHVILLE APARTMENT  
LOCATORS, LLC,**  
Plaintiff,

**V.**

**JOEL SANDERS and  
APARTMENT INSIDERS, LLC,**  
Defendants.

**Case No. 3:22-cv-00193**

**JURY DEMAND  
Judge Trauger**

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**AGREED ORDER ON PRELIMINARY INJUNCTION**

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The parties, as evidenced by the signatures of their counsel below, have proffered a resolution to negate the need for this Court to decide Plaintiff Motion for Preliminary Injunction by entry of this Order. The Court having reviewed such proffer hereby **ORDERS, ADJUDGES AND DECREES** as follows:

1. Defendants, (defined as not only Defendants but their affiliates, successors and assigns and includes any party which the Defendants or their agents direct to act on its behalf) shall transfer all rights and control to the Facebook page [facebook.com/nashvilleapartmentlocators](https://www.facebook.com/nashvilleapartmentlocators) to Plaintiff. Defendants agree that they will no longer have control of this domain.

2. Defendants shall delete the YouTube channel [youtube.com/nashvilleapartmentlocators](https://www.youtube.com/nashvilleapartmentlocators) described in the Complaint. Defendants agree that they will no longer have control of this domain.

3. Defendants shall transfer all rights and control to the nashapartment.com domain described in the Complaint to Plaintiff. Defendants agree that they will no longer have control of this domain.

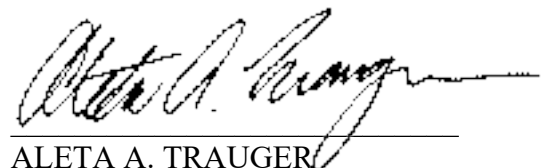
4. Defendants shall revoke the assumed name of “Apartment Locators” with the Tennessee Secretary of State and cease use of that assumed name

5. Defendants represent that they have completed items 1-4 above.

6. Defendants are enjoined, until such time as the Court issues a further order regarding the same, in the United States of America from the use of “Nashville apartment locator(s)” as a source indicator (“source indicator at issue”) or brand regardless of how it is stylized, spelled or misspelled, amalgamized, iterated, singularized or pluralized, spaced or not-spaced and regardless of what goods or services are offered by Defendants using the source indicator at issue. Furthermore, Defendants are further enjoined from using all three of the words “Nashville,” “apartment,” and “locator(s)” contiguously in any combination with no regard to plurality. This injunction shall apply to advertisements, sales and marketing materials, customer facing items, instructional images, embedded search terms, meta tags, back links, blogs, social media posts, marketing campaigns and any other backend keywording and/or indexing utilized by Defendants. Defendants shall comply with all aspects of this injunction on or before June 1, 2022. In the event that Plaintiff identifies a usage of the words “Nashville,” “apartment,” and “locator(s)” contiguously in any combination after June 1, 2022, Plaintiff shall notify Defendants and Defendants shall take all action needed to comply with this Order within five (5) days of receiving such notice.

7. This Court will retain jurisdiction over this matter including the enforcement of this Agreed Order.

**IT IS SO ORDERED.**

  
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ALETA A. TRAUGER  
U.S. DISTRICT JUDGE

**APPROVED FOR ENTRY:**

**SWAFFORD LAW**

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